



...BREAKING...BREAKING....

THE BAND PLAN FROM HELL

Federal Communications Commission

DA 16-453

Initial Clearing Target Band Plan²

21	22	23	24	25	26	27	28	29	9	A	B	C	D	E	F	3	37	3	G	H	I	J	11	A	B	C	D	E	F	G	H	I	J	700 MHz UL							
										Number of Paired Blocks: 10										Total Megahertz: 126																					



**MORE THAN 4632 LPTV AND TV
TRANSLATOR LICENSED FACILITIES,
NEW CPs, & APPs WILL BE DISPLACED
FOR SURE BASED ON THE 126 MHz
CLEARING TARGET RELEASED FRIDAY**

**TOTAL LPTV & TV TRANSLATOR INDUSTRY
DISPLACEMENT COSTS FOR FINDING NEW CHANNELS
AND REBUILDING COULD REACH
AS HIGH AS \$662 MILLION!**

NOTE:

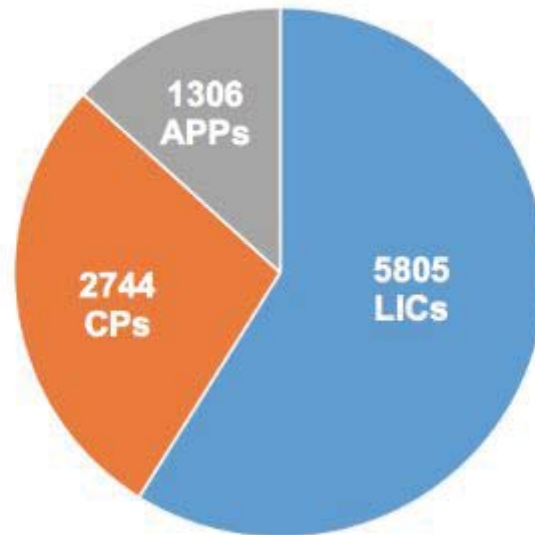
LAST FRIDAY WE WERE INITIALLY INVITED TO THE FCC PRESS BACKGROUND CALL, BUT WERE KICKED OFF AS IT STARTED. SO PLEASE DO READ THE LINKED TRADE PRESS COVERAGE. WE HAVE CONFIRMED FROM TWO SOURCES IN ATTENDANCE DURING THE CALL THAT INDEED THE FCC TOLD THE PRESS ON BACKGROUND THAT IT HAD NOT DONE A SYSTEMATIC STUDY OF THE IMPACTS FROM 126-MHZ BAND PLAN. SO HERE IS OUR VERSION...WE ROUND OFF A LOT SINCE WE ARE TRYING TO SHOW SCALE RATHER THAN EXACTNESS.

HERE ARE THE KEY FCC DOCUMENTS...

[FCC PUBLIC NOTICE](#)
[APPENDIX](#)

THE FOLLOWING ANALYSIS IS BASED ON THE FCC'S LATEST INCENTIVE AUCTION PUBLIC NOTICE AND APPENDIX, AND A MARCH 1, 2016 CDBS DOWNLOAD.

9855 LICs, CPs, & APPs



SO THIS IS OUR TOTAL UNIVERSE TO ANALYZE...

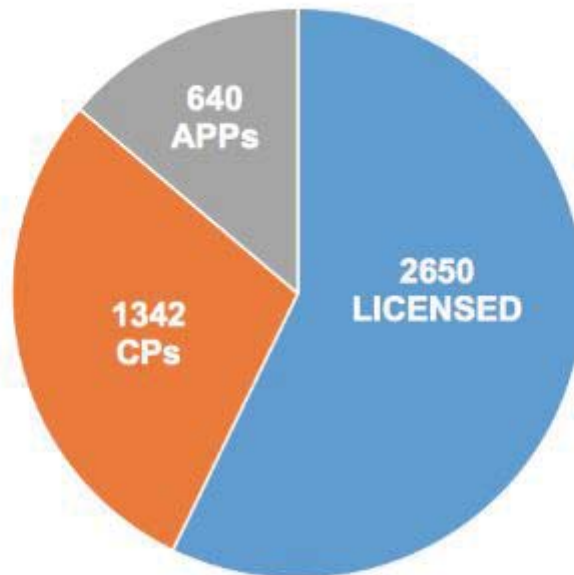
**WHAT THE 126-MHz BAND PLAN DOES IS TO MAKE THE
NEW TV CORE FROM 2-29, 28 CHANNELS**

SO WE NEED TO LOOK AT THE DISTRIBUTION OF LPTV & TV
TRANSLATOR LICENSED FACILITIES, NEW CPs & NEW APPs WHICH ARE
CURRENTLY ASSIGNED OR APPLIED FOR FROM 51-30.

CHANNELS	LICENSED FACILITIES	CONSTRUCTION PERMITS	ACCEPTED APPLICATIONS	TOTALS
UHF 51-30	2650	1342	640	4632
UHF 29-14	1953	1015	489	3457
VHF 13-2	1292	387	177	1856
TOTALS	5805	2744	1306	9855

SO THE FIRST ORDER DISPLACEMENTS ARE DIRECT AND 100%
KNOWN, ASSUMING THE FCC ACHIEVES THE 126-MHz CLEARING. AND
WE CAN NOW SEE THAT THE TOTAL CHANNEL ASSIGNMENTS
IMPACTED ARE...

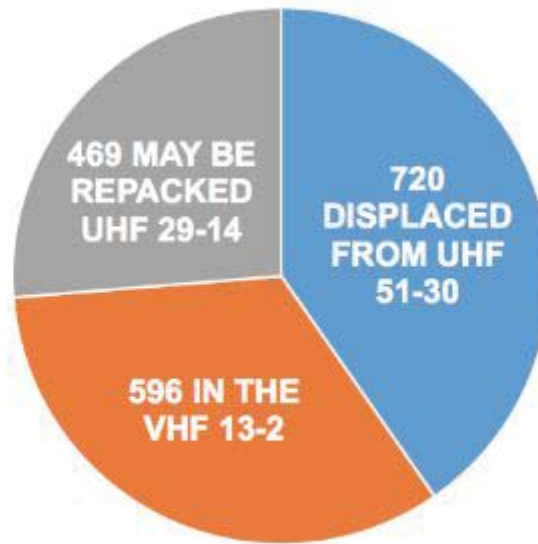
4632 DISPLACED FROM 51-30



REMEMBER, THIS IS ACTUAL REAL 100% DISPLACEMENTS JUST BECAUSE OF THE BAND PLAN ITSELF. IF YOU ARE LICENSED FROM 51-30, THEN YOU WILL GET TO APPLY FOR A NEW CHANNEL FROM 2-29 IN YOUR COMMUNITY OF LICENSE IN THE LPTV DISPLACEMENT WINDOW, APPROX. 6 MONTHS AFTER THE CLOSE OF THE AUCTION, AND AFTER A TRUE-UP CP MOD PROCESS BY THE NON-AUCTION PRIMARIES, AND ELIGIBLE CLASS A'S.

BUT THIS IS NOT ALL, NOT EVEN CLOSE...WE NEED TO LOOK AT THE DISPLACEMENTS OF THE PRIMARY STATIONS, AS THOSE NOT SOLD IN THE AUCTION WILL ALSO BE MOVING TO THE NEW TV CORE 2-29.

1785 LICENSED PRIMARIES



SO WE CAN SEE THAT FOR SURE 720 WILL BE DISPLACED BACK DOWN INTO 29-14, SINCE INVOLUNTARY VHF ASSIGNMENTS CAN NOT BE MADE. THE QUESTION NOW BECOMES HOW MANY TOTAL PRIMARIES AND CLASS A'S WILL SELL IN THE AUCTION? LET'S JUST SAY 500 FOR NOW. SO ABOUT 1285 REMAIN TO REPACK. THROW IN SOME CLASS A'S NOT SOLD, OR NOT NEEDED...HECK LET'S JUST MAKE IT 1500 TO FIND NEW CHANNELS FOR.

SO WHAT THIS MEANS, IS THAT 1500 MOVING PIECES ON THE BOARD, THEREBY DISRUPTING AND DISPLACING THE LPTV & TRANSLATOR LICENSED FACILITIES, CP'S, AND APP'S. BUT THIS IS GETTING CONFUSING...LET'S DO SOME BASIC MATH:

210 TV DMA
X 28 NEW TV CORE CHANNELS 2-29
5880 TOTAL POTENTIAL CHANNELS IN EACH TV DMA

AND WE KNOW THAT ABOUT
1500 REPACKING PRIMARIES AFTER THE AUCTION (BIG GUESS)
LEAVING ABOUT 4380 REMAINING CHANNELS FOR LPTV/TX

**OH NO! WE KNOW THAT THERE ARE
9855 BUILT, CPs, AND APPs ALREADY IN THE SYSTEM
SO HOW DO WE GET 9855 INTO 4380? WHERE DO WE GET
ANOTHER 5475 CHANNELS!**

TA DAH....DRUM ROLL PLEASE...

LPTV & TV TRANSLATORS ARE NOT GOVERNED BY TV DMA, BUT BY THEIR CONTOUR IN THEIR COMMUNITY OF LICENSE (COL)

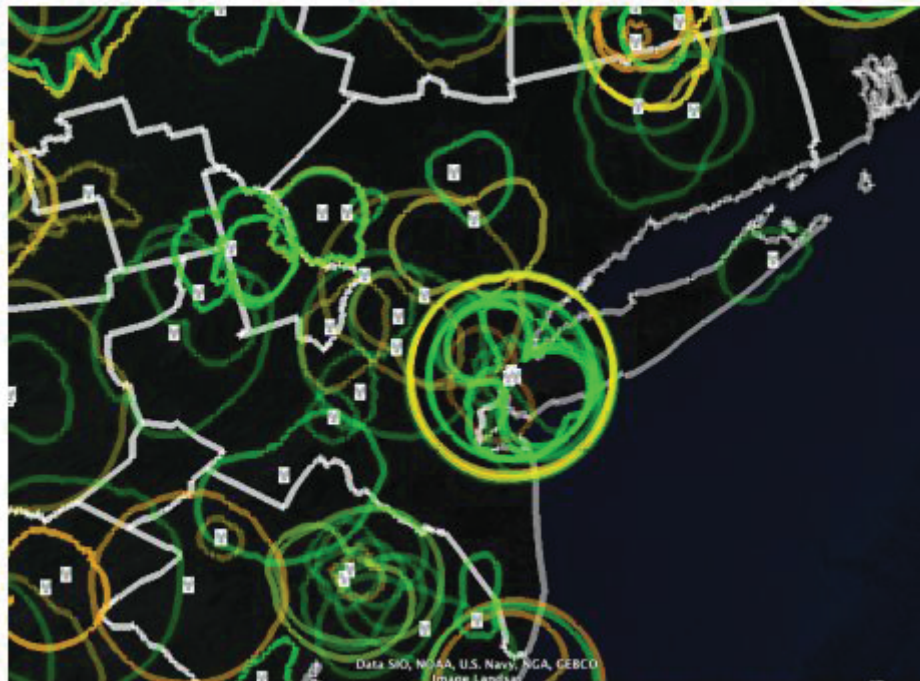
THERE ARE ABOUT 2355 LPTV AND TRANSLATOR COL
SO WE COULD DO THIS...

2355 LPTV/TX COL
X 28 NEW TV CORE CHANNELS 2-29
65,940 CHANNEL OPPORTUNITIES

CURRENT INDUSTRY PRACTICE IS TO "CHANNEL STACK" ON THE SAME FREQUENCY AND TO BE GEOGRAPHICALLY SPREAD OUT IN A LARGE MARKET TO DO IT.

OUR RESEARCH SHOWS THAT IN THE TOP 25 MARKET, WHERE 50% OF ALL LPTV/TX COVERAGE POPS ARE (800 MILLION OF THE 1.6 BILLION), IN THESE MARKETS, "CHANNEL STACKING" IS A COMMON PRACTICE, SO WE THINK IT WILL BE USED AGAIN POST AUCTION.

WILL YOU HAVE TO MOVE TOWERS, OR GET THE SAME COVERAGE? NAB RAN THEIR STUDY AND SHOWED SIGNIFICANT DISPLACEMENTS ALSO...OUR STUDY IS NOT ENGINEERING BASED AS THEIRS WAS, OURS IS JUST SIMPLE MATH, AND A DETAILED UNDERSTANDING OF CURRENT INDUSTRY PRACTICES.



PEA #1 NEW YORK - BIG MAP PROJECTION OF LD, LP, CA, DC LICENSED, CPS, APPS

WILL YOU GET THE SAME COVERAGE, BE ABLE TO SELL CHANNEL LEASES FOR THE SAME PRICE, OR EVEN BE IN THE SAME BUSINESS?
 IT WILL ALL BE KNOWN AFTER THE AUCTION AND DISPLACEMENT PROCESS. BUT YOU HAVE THE RIGHT TO GO DO IT, AND THE SPECTRUM YOU WILL GET WILL HAVE A TREMENDOUS VALUE, SINCE ITS' VALUE WILL BE PEGGED ON WHAT THE INCENTIVE AUCTION SOLD FOR. FURTHER, AND MOST IMPORTANTLY, YOU WILL HAVE A TICKET TO THE FUTURE OF ATSC 3.0.

BUT THIS WILL COST ALL OF US HARD COLD CASH, CREDIT, AND LOTS OF TIME...

CHANNELS	LICENSED FACILITIES	# TO BE DISPLACED	RELO COSTS	TOTAL COSTS
51-30	2650	2650	\$150K	\$375 MILLION
29-14	1953	1200	\$150K	\$180 MILLION
13-2	1292	300	\$150K	\$45 MILLION
	5805	4150	\$150K	\$622 MILLION

AND WE NEED TO NOT FORGET ABOUT THE CP's AND ACCEPTED APPLICATIONS, SINCE THEY ALSO HAVE A REAL COST. WE ARE ASSUMING THAT 100% OF ALL CPs AND APPs WILL BE DISPLACED AND HAVE TO REAPPLY. THE BASIC SUNKEN COST IS APPROX \$5K EACH, AND NEW LEGAL AND ENGINEERING WILL ALSO BE \$5K, SO \$10K TOTAL FOR EACH CP AND APP, COMING TO A TOTAL OF \$40 MILLION.

\$622 MILLION FOR RELOCATION MOVES
\$40 MILLION FOR NEW APPLICATIONS
\$662 MILLION ESTIMATED HARD COSTS
FOR THE 9855 LICENSES, PERMITS, AND EXISTING APPS

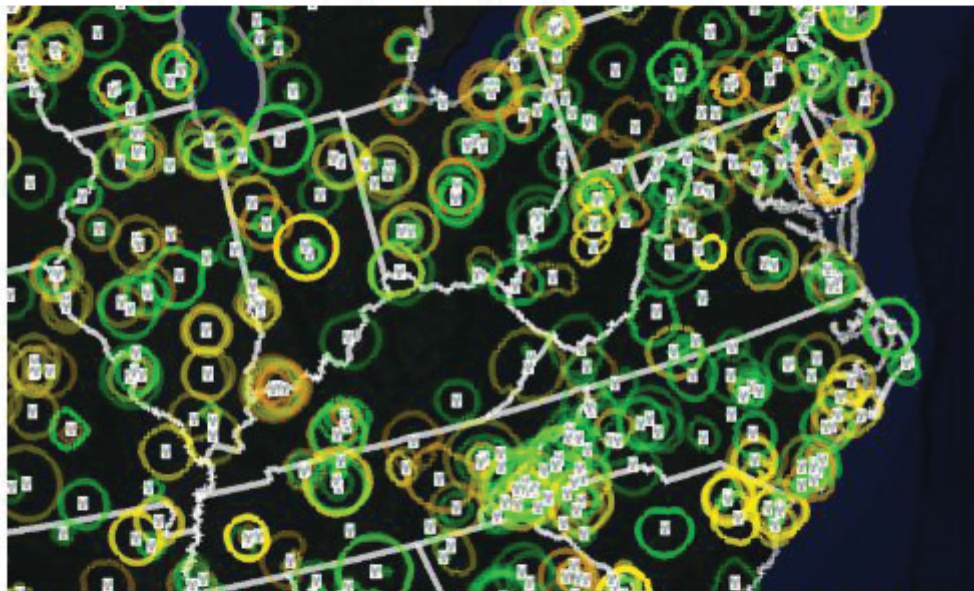
THERE ARE OTHER DIRECT IMPACTS TO COMMUNITIES OF LICENSE...

ALBUQUERQUE, NM = 8 OF 9 LICENSED LD ARE DISPLACED
ATLANTA, GA = 6 OF 11 LICENSED LD ARE DISPLACED
BAKERSFIELD, CA = 5 OF 9 LICENSED LD ARE DISPLACED
AND THE LIST GOES ON....MORE AS WE GET THROUGH THE DATA.



LPTV INDUSTRY NEWS - TUE. - MAY 3, 2016

...THE DEVIL IS IN THE DETAILS...



COALITION BIG MAP OF CA, LD, LP, TX AND CPs WHICH WILL BE DISPLACED BY 126-MHZ BAND PLAN DOES NOT SHOW THE SECONDARY DISPLACEMENTS FROM 29-2 AS A RESULT OF REPACKING PRIMARIES

**NOT EACH MARKET
IS THE SAME!!**

**THE 126-MHz BAND PLAN DOES NOT
WORK IN EACH MARKET, SO 2-29 IS NOT
THE NEW TV CORE IN EACH MARKET**

SIX BASIC BAND PLANS USED IN 11 VARIOUS CONFIGURATIONS TO ACHIEVE THE NATIONAL CLEARING OBJECTIVES

DO YOU KNOW YOUR BAND PLAN?

Federal Communications Commission

FCC 14-191

10. The 600 MHz Band Plan we adopted in the *Incentive Auction R&O* consists of an uplink band that will begin at channel 51 (698 MHz), followed by a duplex gap, and then a downlink band.²⁷ Because the incentive auction may be conducted in several stages, each for a different "spectrum clearing target," we adopted a set of band plan scenarios based on the number of television channels cleared.²⁸ Figure 1 shows the band plan scenario associated with each potential spectrum clearing target.

12	144	21	22	23	24	25	26	7	A	B	C	D	E	F	G	H	I	J	3	37	3	K	L	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL					
11	136	21	23	25	28	25	26	27	11	A	B	C	D	E	F	G	H	I	J	37	3	K	L	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL					
10	128	21	22	23	24	25	26	27	28	29	5	A	B	C	D	E	F	G	H	I	J	37	3	K	L	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL			
9	114	21	22	23	24	25	26	27	28	29	30	31	7	A	B	C	D	E	F	G	H	I	J	37	3	K	L	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL	
8	106	21	23	25	28	25	26	27	28	29	30	31	32	11	A	B	C	D	E	F	G	H	I	J	37	3	K	L	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL
7	94	21	23	28	24	26	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		
6	78	21	23	25	24	25	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		
5	72	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		
4	90	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		
3	48	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		
2	42	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	3	A	B	C	D	E	F	G	11	A	B	C	D	E	F	G	H	I	J	K	L	700MHz UL		

Figure 1: Band Plan Scenarios

Well folks, while we were deep into a data dive about the impacts of the band plan on the entire industry, the obvious slapped us across the face into realizing that in order to achieve the lofty goals of the Commission, that there are 11 different configurations of clearing needed to make this all work for the FCC. Assume any of the 416 PEAs not mentioned below are the full 126-MHz, down to 30 plan.

Here is the Appendix which came along with last week's Band Plan.

FCC 14-191		FCC 14-191	
APPENDIX A		APPENDIX A	
Downlink Auction Bands in Each PEA		Downlink Auction Bands in Each PEA	
PEA ID	PEA Name	Category 1 Bands	Category 2 Bands
PEA ID	PEA Name	Category 1 Bands	Category 2 Bands
PEA001	Alaska	1	1
PEA002	Alabama	1	1
PEA003	Alaska	1	1
PEA004	Alaska	1	1
PEA005	Alaska	1	1
PEA006	Alaska	1	1
PEA007	Alaska	1	1
PEA008	Alaska	1	1
PEA009	Alaska	1	1
PEA010	Alaska	1	1
PEA011	Alaska	1	1
PEA012	Alaska	1	1
PEA013	Alaska	1	1
PEA014	Alaska	1	1
PEA015	Alaska	1	1
PEA016	Alaska	1	1
PEA017	Alaska	1	1
PEA018	Alaska	1	1
PEA019	Alaska	1	1
PEA020	Alaska	1	1
PEA021	Alaska	1	1
PEA022	Alaska	1	1
PEA023	Alaska	1	1
PEA024	Alaska	1	1
PEA025	Alaska	1	1
PEA026	Alaska	1	1
PEA027	Alaska	1	1
PEA028	Alaska	1	1
PEA029	Alaska	1	1
PEA030	Alaska	1	1
PEA031	Alaska	1	1
PEA032	Alaska	1	1
PEA033	Alaska	1	1
PEA034	Alaska	1	1
PEA035	Alaska	1	1
PEA036	Alaska	1	1
PEA037	Alaska	1	1
PEA038	Alaska	1	1
PEA039	Alaska	1	1
PEA040	Alaska	1	1
PEA041	Alaska	1	1
PEA042	Alaska	1	1
PEA043	Alaska	1	1
PEA044	Alaska	1	1
PEA045	Alaska	1	1
PEA046	Alaska	1	1
PEA047	Alaska	1	1
PEA048	Alaska	1	1
PEA049	Alaska	1	1
PEA050	Alaska	1	1
PEA051	Alaska	1	1
PEA052	Alaska	1	1
PEA053	Alaska	1	1
PEA054	Alaska	1	1
PEA055	Alaska	1	1
PEA056	Alaska	1	1
PEA057	Alaska	1	1
PEA058	Alaska	1	1
PEA059	Alaska	1	1
PEA060	Alaska	1	1
PEA061	Alaska	1	1
PEA062	Alaska	1	1
PEA063	Alaska	1	1
PEA064	Alaska	1	1
PEA065	Alaska	1	1
PEA066	Alaska	1	1
PEA067	Alaska	1	1
PEA068	Alaska	1	1
PEA069	Alaska	1	1
PEA070	Alaska	1	1
PEA071	Alaska	1	1
PEA072	Alaska	1	1
PEA073	Alaska	1	1
PEA074	Alaska	1	1
PEA075	Alaska	1	1
PEA076	Alaska	1	1
PEA077	Alaska	1	1
PEA078	Alaska	1	1
PEA079	Alaska	1	1
PEA080	Alaska	1	1
PEA081	Alaska	1	1
PEA082	Alaska	1	1
PEA083	Alaska	1	1
PEA084	Alaska	1	1
PEA085	Alaska	1	1
PEA086	Alaska	1	1
PEA087	Alaska	1	1
PEA088	Alaska	1	1
PEA089	Alaska	1	1
PEA090	Alaska	1	1
PEA091	Alaska	1	1
PEA092	Alaska	1	1
PEA093	Alaska	1	1
PEA094	Alaska	1	1
PEA095	Alaska	1	1
PEA096	Alaska	1	1
PEA097	Alaska	1	1
PEA098	Alaska	1	1
PEA099	Alaska	1	1
PEA100	Alaska	1	1

GET THE PDF OF ALL 416 PEAS

PEA ID	PEA Name	Category 1 Blocks			Total Category 2 Blocks
		Blocks With Zero Impairment	Blocks with More Than Zero Impairment**	Total Category 1 Blocks	
PEA001	New York, NY	9	1	10	0
PEA002	Los Angeles, CA*	5	0	5	0

In PEA001, New York City area (which actually goes all the way through CT to the RI border), while there is 1 block with some impairment, the FCC is clearing and selling 10 full blocks of spectrum, or 100-MHz, and 26-MHz of gap and guard bands. But next in PEA002, LA, they are selling only five (5) 10-MHz blocks, which is hybrid between Band Plans 2 or 3, 42-MHz to 48-MHz. We assume in the LA PEA (see map below) the new TV core will be 2-43 or so.

3	48	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300	1301	1302	1303	1304	1305	1306	1307	1308	1309	1310	1311	1312	1313	1314	1315	1316	1317	1318	1319	1320	1321	1322	1323	1324	1325	1326	1327	1328	1329	1330	1331	1332	1333	1334	1335	1336	1337	1338	1339	1340	1341	1342	1343	1344	1345	1346	1347	1348	1349	1350	1351	1352	1353	1354	1355	1356	1357	1358	1359	1360	1361	1362	1363	1364	1365	1366	1367	1368	1369	1370	1371	1372	1373	1374	1375	1376	1377	1378	1379	1380	1381	1382	1383	1384	1385	1386	1387	1388	1389	1390	1391	1392	1393	1394	1395	1396	1397	1398	1399	1400	1401	1402	1403	1404	1405	1406	1407	1408	1409	1410	1411	1412	1413	1414	1415	1416	1417	1418	1419	1420	1421	1422	1423	1424	1425	1426	1427	1428	1429	1430	1431	1432	1433	1434	1435	1436	1437	1438	1439	1440	1441	1442	1443	1444	1445	1446	1447	1448	1449	1450	1451	1452	1453	1454	1455	1456	1457	1458	1459	1460	1461	1462	1463	1464	1465	1466	1467	1468	1469	1470	1471	1472	1473	1474	1475	1476	1477	1478	1479	1480	1481	1482	1483	1484	1485	1486	1487	1488	1489	1490	1491	1492	1493	1494	1495	1496	1497	1498	1499	1500	1501	1502	1503	1504	1505	1506	1507	1508	1509	1510	1511	1512
---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------

And so it goes...next less than 10 cleared blocks is the DC/Baltimore PEA005, which only can clear eight (8) 10-MHz blocks, or the 108-MHz band plan.

PEA005	Baltimore, MD-Washington, DC	7	1	8	0
PEA006	Philadelphia, PA	8	1	9	0

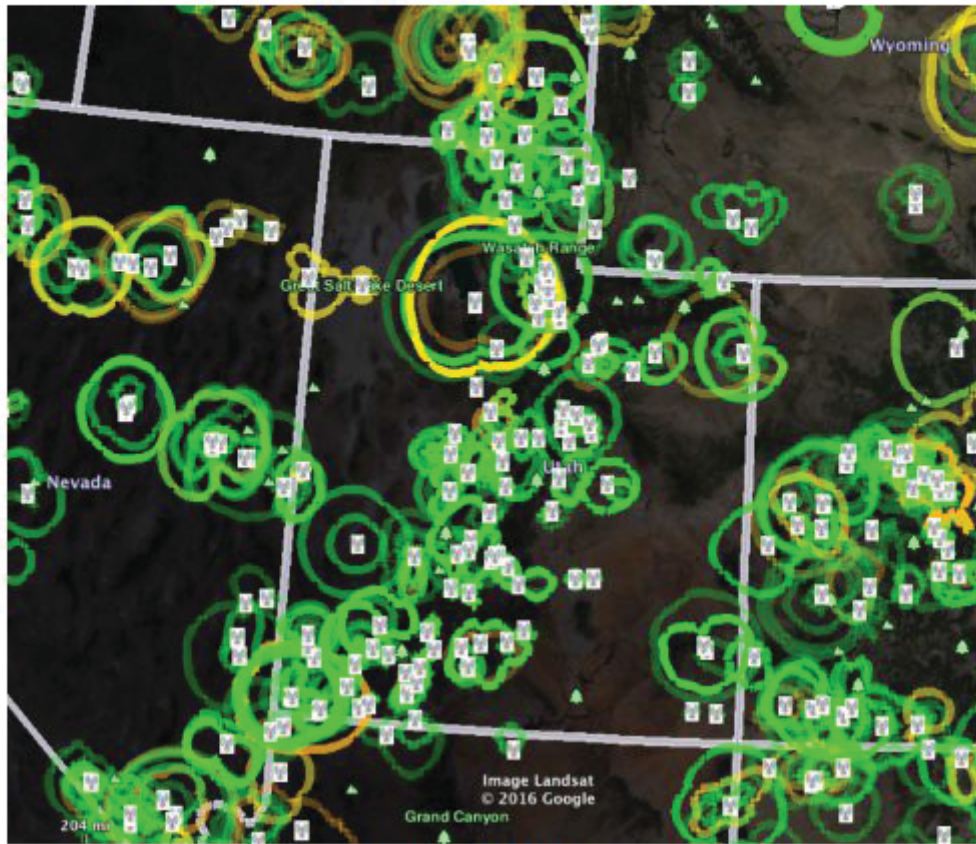
8 108 21 22 23 24 25 26 27 28 29 30 31 32 11 A B 5 37 3 C D E F G H 11 A B C D E F G H 100MHz UL



And the coverage maps of the potentially displaced CA, LP, LD, and TX in the PEA



**...RURAL COMMUNITIES ON THE HOOK TO
PAY \$MILLIONS FOR FREE TV...**



COALITION BIG MAP OF CA, LD, LP, TX AND CPs IN THE UTAH AND ADJOINING STATES

RURAL DAMAGE ESTIMATES FAR EXCEED FCC & CONGRESSIONAL ESTIMATES

**THE TRUE COST OF THE INCENTIVE
AUCTION TO RURAL AMERICA'S FREE TV**

MANY SMALL RURAL COMMUNITIES WILL HAVE TO
FINANCE SIX FIGURE DISPLACEMENT CHANNEL
RELOCATION COSTS OUT OF POCKET - IS THIS WHAT
THE 112TH CONGRESS WANTED?

**HERE ARE SOME OF THE DAMAGES
AT THE LOCAL LEVEL**

*DOES NOT COUNT DISPLACEMENTS WITHIN 29-14
THIS CHART IS ONLY FOR THE KNOWN 51-30 DISPLACEMENTS*

COMMUNITY OF LICENSE	STATE	TOTAL # LICENSED	# LICENSED 51-30	AVERAGE \$ COST/MOVE	TOTAL
ANCHORAGE	AK	8	4	\$ 150,000	\$600,000
ABILENE	TX	7	4	\$150,000	\$600,000
AKRON	CO	8	5	\$150,000	\$750,000
ALAMORORDO	NM	12	6	\$150,000	\$900,000
ALBUQUERQUE	NM	10	8	\$150,000	\$1,200,000

THE LIST GOES ON FOR MORE 2200+ COMMUNITIES OF LICENSE. WE
HOPE TO HAVE A DETAILED ANALYSIS IN TIME FOR THE NATIONAL
TRANSLATOR ASSOCIATION CONVENTION THE WEEKEND OF THE 13TH.